

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

**Jane Does 1-9,**

**Plaintiffs,**

**v.**

**Collins Murphy, Limestone College,  
Mindgeek Holding SARL a/k/a Mindgeek  
USA, Inc. d/b/a Pornhub.com, and Hammy  
Media, Ltd. d/b/a Xhamster.com,**

**Defendants.**

**Civil Action No.: 3:20-av-99999**

**DEFENDANT COLLINS MURPHY'S  
ANSWERS TO LOCAL RULE 26.01  
INTERROGATORIES**

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NOW COMES Defendant Collins Murphy, (hereinafter "Defendant") by and through his undersigned counsel, and, pursuant to Local Civil Rule 26.01, states as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

**ANSWER: None to Defendant's knowledge.**

(B) As to each claim, state whether it should be tried jury or nonjury and why.

**ANSWER: Plaintiffs request a jury trial and Defendant does not dispute such request.**

(C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

**ANSWER: Not applicable.**

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

**ANSWER: Plaintiff filed suit in this Division and Defendant does not dispute the same because, upon information and belief, the location where the alleged incident occurred is within the Spartanburg Division.**

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**ANSWER: To Defendant's knowledge, there are no other related actions filed in this District.**

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**ANSWER: Defendant is properly identified.**

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

**ANSWER: Not applicable.**

Respectfully submitted,

**HALL, BOOTH, SMITH, P.C.**

/s/ Alan Belcher

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*Counsel for Defendant Collins Murphy*

This 10<sup>th</sup> day of June, 2020  
Mount Pleasant, South Carolina